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COURTNEY M. PRICE
VICE PRESIDENT
CHEMSTAR


**American
Chemistry
Council**
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February 5, 2004

Via E-mail and US Mail

Mr. Michael O. Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

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**Re: Rubber and Plastics Additives (RAPA) Panel
HPV Chemical Challenge Program (Program)
Changes in Chemicals Sponsored by the RAPA Panel**

Dear Mr. Leavitt:

On November 22, 1999, the RAPA Panel (Panel) of the American Chemistry Council volunteered to serve as an industry consortium under the Program. Additional correspondence concerning the RAPA Panel's commitments were submitted on December 30, 1999, February 1, 2000, November 5, 2001, November 7, 2001, December 18, 2001, December 20, 2002 and July 3, 2003. By this letter, the RAPA Panel informs EPA of changes in the Panel's commitment to sponsor two chemicals. Members of the RAPA Panel HPV consortium include: Alco Chemicals; Bayer Polymers LLC; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and R.T. Vanderbilt Company, Inc.

Table 1, attached, lists the 37 chemicals sponsored in the Program by the Panel as of July 2003. As explained in two letters from Noveon, Inc. to the Program, both dated December 29, 2003, Noveon, Inc. is discontinuing the manufacture and sponsorship of two chemicals:

- Phosphorous acid, 2-tert-butyl-.alpha.-(3-tert-butyl-4-hydroxyphenyl)-p-cumenyl bis(p-nonylphenyl) ester (CAS number 20227-53-6), and
- Phosphorochloridous acid, bis(4-nonylphenyl) ester (CAS number 63302-49-8).

With this development, these two chemicals are no longer produced by any Panel member company and will no longer be sponsored in the Program by the Panel.

Table 2, attached, contains the list of Panel-sponsored chemicals, revised to reflect the final list of 35 chemicals sponsored in the Program by the Panel. Test plans and robust summaries have been submitted to the Program for the 35 chemicals sponsored by the RAPA Panel, and revised submissions have been made for many categories and chemicals. Comments received from EPA and the public so far have generally agreed that the RAPA chemicals have a



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robust set of existing data, reflecting the high level of understanding of potential hazards. In a few instances, the Panel agrees with EPA or other commenters that collection of additional data is warranted to address Program requirements. The Panel plans to collect these data and submit the results to the Program.

If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Courtney M. Price
Vice President, CHEMSTAR

Attachments

Table 1
Chemicals Sponsored by the Rubber & Plastic Additives (RAPA) Panel as of July 2003
Highlighted Chemicals are No Longer Sponsored by RAPA as of December 31, 2003

Chemical Name	CAS Number
Phenol, 4,4'-butylidenebis [2-(1,1-dimethylethyl)-5-methyl]	85-60-9
Benzothiazole, 2-(morpholinodithio)-	95-32-9
Phenol, 4,4'-thiobis[2-(1,1-dimethylethyl)-5-methyl]	96-69-5
Sulfide, bis(dimethylthiocarbamoyl)	97-74-5
Disulfide, bis(diethylthiocarbamoyl)	97-77-8
Diphenylamine, 4,4'-dioctyl-	101-67-7
p-Phenylenediamine, N,N'-di-sec-butyl-	101-96-2
Benzothiazole, 2-(morpholinothio)-	102-77-2
Disulfide, bis(dimethylthiocarbamoyl)	137-26-8
2(3H)-Benzothiazolethione	149-30-4
2(3H)-Benzothiazolethione, zinc salt	155-04-4
2(3H)-Benzothiazolethione, sodium salt	2492-26-4
p-Phenylenediamine, N-(1,4-dimethylpentyl)-N'-phenyl-	3081-01-4
p-Phenylenediamine, N,N'-bis(1,4-dimethylpentyl)-	3081-14-9
2-Benzothiazolesulfenamide, N,N-dicyclohexyl-	4979-32-2
p-Cresol, 2,2'-methylenebis[6-nonyl]-	7786-17-6
Diphenylamine, 4,4'-bis(alpha,alpha-dimethylbenzyl)-	10081-67-1
Benzenamine, ar-nonyl-N-(nonylphenyl)-	36878-20-3
Phenol, styrenated	61788-44-1
Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene	68411-46-1
Benzenamine, N-phenyl-, styrenated	68442-68-2
Phenol, isobutylenated methylstyrenated	68457-74-9
Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) derivatives.	68608-77-5
Phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene	68610-51-5
Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene	68921-45-9
1,4-Benzenediamine, N,N'-mixed Ph and tolyl derivatives.	68953-84-4
Benzenamine, N-phenyl-, reaction product with isobutylene and 2,4,4-trimethylpentene	184378-08-3
Carbamic acid, dimethyldithio-, sodium salt	128-04-1
Zinc, bis(dibutyldithiocarbamato)-	136-23-2
Phenol, 4,4'-isopropylidenebis[2-tert-butyl]-	79-96-9
Guanidine, 1,3-diphenyl-	102-06-7
Morpholine, 4,4'-dithiodi-	103-34-4
Morpholine, 4-[(morpholinothiocarbonyl)thio]-	13752-51-7
Phthalimide, N-(cyclohexylthio)-	17796-82-6
Phosphorous acid, 2-tert-butyl-.alpha.-(3-tert-butyl-4-hydroxyphenyl)-p-cumenyl bis(p-nonylphenyl) ester	20227-53-6
1,3,5 Tris(3,5-di-terb-butyl-4-hydroxybenzyl)-1,3,5-triazine-2,4,6(1H,3H,5H)-trione	27676-62-6
Phosphorochloridous acid, bis(4-nonylphenyl) ester	63302-49-8

Table 2
Revised List of Chemicals Sponsored by the Rubber & Plastic Additives (RAPA) Panel
as of December 31, 2003

Chemical Name	CAS Number
Phenol, 4,4'-butylidenebis [2-(1,1-dimethylethyl)-5-methyl]	85-60-9
Benzothiazole, 2-(morpholinodithio)-	95-32-9
Phenol, 4,4'-thiobis[2-(1,1-dimethylethyl)-5-methyl]	96-69-5
Sulfide, bis(dimethylthiocarbamoyl)	97-74-5
Disulfide, bis(diethylthiocarbamoyl)	97-77-8
Diphenylamine, 4,4'-dioctyl-	101-67-7
p-Phenylenediamine, N,N'-di-sec-butyl-	101-96-2
Benzothiazole, 2-(morpholinothio)-	102-77-2
Disulfide, bis(dimethylthiocarbamoyl)	137-26-8
2(3H)-Benzothiazolethione	149-30-4
2(3H)-Benzothiazolethione, zinc salt	155-04-4
2(3H)-Benzothiazolethione, sodium salt	2492-26-4
p-Phenylenediamine, N-(1,4-dimethylpentyl)-N'-phenyl-	3081-01-4
p-Phenylenediamine, N,N'-bis(1,4-dimethylpentyl)-	3081-14-9
2-Benzothiazolesulfenamide, N,N-dicyclohexyl-	4979-32-2
p-Cresol, 2,2'-methylenebis[6-nonyl]-	7786-17-6
Diphenylamine, 4,4'-bis(alpha,alpha-dimethylbenzyl)-	10081-67-1
Benzenamine, ar-nonyl-N-(nonylphenyl)-	36878-20-3
Phenol, styrenated	61788-44-1
Benzenamine, N-phenyl-, reaction products with 2,4,4-trimethylpentene	68411-46-1
Benzenamine, N-phenyl-, styrenated	68442-68-2
Phenol, isobutylenated methylstyrenated	68457-74-9
Benzenamine, 2-ethyl-N-(2-ethylphenyl)-, (tripropenyl) derivatives.	68608-77-5
Phenol, 4-methyl-, reaction products with dicyclopentadiene and isobutylene	68610-51-5
Benzenamine, N-phenyl-, reaction products with styrene and 2,4,4-trimethylpentene	68921-45-9
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Benzenamine, N-phenyl-, reaction product with isobutylene and 2,4,4-trimethylpentene	184378-08-3
Carbamic acid, dimethyldithio-, sodium salt	128-04-1
Zinc, bis(dibutyldithiocarbamato)-	136-23-2
Phenol, 4,4'-isopropylidenebis[2-tert-butyl]-	79-96-9
Guanidine, 1,3-diphenyl-	102-06-7
Morpholine, 4,4'-dithiodi-	103-34-4
Morpholine, 4-[(morpholinothiocarbonyl)thio]-	13752-51-7
Phthalimide, N-(cyclohexylthio)-	17796-82-6
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